

RUSS, AUGUST & KABAT

Marc Fenster (SBN 181067)  
mfenster@raklaw.com  
Reza Mirzaie (SBN 246953)  
rmirzaie@raklaw.com  
Neil A. Rubin (SBN 250761)  
nrubin@raklaw.com  
Jacob Buczko (SBN 269408)  
jbuczko@raklaw.com  
James A. Milkey (SBN 281283)  
jmilkey@raklaw.com  
James Tseui (SBN 285530)  
jtseui@raklaw.com  
Amy E. Hayden (SBN 287026)  
ahayden@raklaw.com  
Christian Conkle (SBN 306374)  
cconkle@raklaw.com  
Qi (Peter) Tong (SBN 300347)  
ptong@raklaw.com  
Jonathan Ma (SBN 312773)  
jma@raklaw.com  
Daniel Kolko (SBN 341680)  
dkolko@raklaw.com  
**RUSS AUGUST & KABAT**  
12424 Wilshire Boulevard, 12th Floor  
Los Angeles, California 90025  
Telephone: (310) 826-7474  
Facsimile: (310) 826-9226  
*Attorneys for Defendant,*  
*VirtaMove Corp.*

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

RED HAT, INC.,

Plaintiff,

v.

VIRTAMOVE CORP.,

Defendant.

Case No. 5:24-cv-04740-PCP

**DECLARATION OF SUSAN CAMERON  
IN SUPPORT OF PLAINTIFF  
VIRTAMOVE'S NOTICE OF MOTION  
AND MOTION TO DISMISS RED  
HAT'S COMPLAINT UNDER FED. R.  
CIV. P. 12(b)(1) AND 12(b)(2)**

1 I, Susan Cameron, declare as follows:

2 1. I am the Customer Engagement and Business Operations Manager and Office  
3 Manager at VirtaMove Corp. My job responsibilities include managing relationships with potential  
4 and existing customers, human resources activities, day-to-day accounting, and other various  
5 administrative activities.

6 2. VirtaMove has never contacted Red Hat, Inc. concerning any of its patents,  
7 including U.S. Patent Nos. 7,519,814 (“the ’814 patent”) and 7,784,058 (“the ’058 patent”).

8 3. VirtaMove has never communicated to Red Hat that its Open Shift product or any  
9 other of its products may infringe a VirtaMove patent, including the ’814 and ’058 patents.

10 4. VirtaMove does not have any office locations within the state of California.

11  
12 I declare under the penalty of perjury under the laws of the United States of America that  
13 the foregoing is true and correct. Executed at Ottawa, Ontario on September 20, 2024.

14  
15 

16 Susan Cameron  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28